

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BLOCKSTREAM CORPORATION,  
THIGMOTROPISM LLC, and ADAM  
BACK,

Petitioners,

v.

INNOSILICON TECHNOLOGY LTD,

Respondent.

Civil Action No. \_\_\_\_\_

**DECLARATION OF JOHN M. CONLON  
IN SUPPORT OF PETITION TO  
CONFIRM ARBITRATION AWARD**

I, John M. Conlon, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am an attorney in good standing in the state bar of New York and partner at the law firm of Mayer Brown LLP, attorneys for petitioners Blockstream Corporation, Thigmotropism LLC, and Adam Back, collectively “Petitioners,” in the above matter.

2. I submit this Declaration in support of Petitioners’ Petition to Confirm Arbitration Award.

3. I am familiar with the facts and circumstances of the agreements and underlying dispute between Petitioners and Innosilicon Technology Ltd. (“Respondent”) that culminated in the Hong Kong International Arbitration Centre’s (“HKIAC”) decision in Case Number HKIAC/A20302 dated February 16, 2024 (the “Final Award”).

4. Attached as Exhibit 1 is a true and correct copy of the Partial Final Award issued by the HKIAC on December 19, 2023.

5. Attached as Exhibit 2 is a true and correct copy of the Final Award issued by the HKIAC on February 16, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 30, 2025  
New York, New York

Respectfully submitted,  
/s/John M. Conlon  
John M. Conlon  
Kevin Brett Weehunt Jr.  
Mayer Brown LLP  
1221 Avenue of the Americas  
New York, NY 10020-1001  
Tel: (212) 506-2500  
jconlon@mayerbrown.com  
kweehunt@mayerbrown.com

*Attorneys for Petitioners Blockstream  
Corporation, Thigmotropism LLC, and Adam  
Back*